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ENVIRONMENT

Mr. Stephen L. Johnson U.S. Environmental Protection Agency

Ben Franklin Post Office

P.O. Box 862

Washington, DC 20044

Attn: Chemical Right-to-Know Program

Subject.

Submission of documents for Dicamba Intermediates Category under the HPV Challenge Program, AR 201, via electronic submission to oppt.ncic@epa.gov

Dear Administrator Johnson:

On behalf of BASF Corporation, we are submitting the attached revised test plan and robust summaries for the dicamba intermediates category. This includes the following seven chemicals, plus dicamba as a supporting chemical.

CAS Number	Name
1982-69-0	Dicamba, sodium salt (3,6-Dichloro-2-methoxybenzoic acid, sodium salt)
68938-79-4	3,6-Dichloro-2-hydroxybenzoic acid, potassium sodium salt
68938-80-7	3,6-Dichloro-2-hydroxybenzoic acid, dipotassium salt
583-78-8	2,5-Dichlorophenol
52166-72-0	2,5-Dichlorophenol, sodium salt
68938-81-8	2,5-Dichlorophenol, potassium salt
1984-58-3	2,5-Dichloroanisole
1918-00-9	Dicamba (3.6-dichloro-2-methoxybenzoic acid)

This submission, made under the U.S. EPA's High Production Volume Chemical Challenge Program, consists of a test plan and robust summaries for the eight chemicals listed above.

Several studies proposed to be conducted in the previous submission, as well as additional studies recommended by the Agency, have now been conducted and are included in the revised test plan and robust summaries.

The documents are being submitted in electronic format (Adobe Acrobat pdf files). In addition, we are submitting eight IUCLID version 4 export files for inclusion in HPVIS. Date:

December 26, 2007

Contact:

Jane Staveley

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Our ref:

RN006150.0001

Imagine the result

ARCADIS

Mr. Stephen L. Johnson
December 26, 2007

If you have difficulty with the electronic submission or require additional information, please contact me, as BASF's representative, by phone (919-544-4535) or e-mail (jane.staveley@arcadis-us.com).

Sincerely, ARCADIS U.S., Inc.

Jane P. Staveley
Principal Environmental Scientist

Attachments:

- Test Plan for Dicamba Intermediates Category (pdf)
- Robust summaries: 3,6-Dichloro-2-methoxybenzoic acid, sodium salt, 1982-69-0 (pdf)
- Robust summaries: 3,6-Dichloro-2-hydroxybenzoic acid, potassium sodium salt, 68938-79-4 (pdf)
- Robust summaries: 3,6-Dichloro-2-hydroxybenzoic acid, dipotassium salt, 68938-80-7 (pdf)
- Robust summaries: 2,5-Dichlorophenol, 583-78-8 (pdf)
- Robust summaries: 2,5-Dichlorophenol, sodium salt, 52166-72-0 (pdf)
- Robust summaries: 2,5-Dichlorophenol, postassium salt, 68938-81-8 (pdf)
- Robust summaries: 2,5-Dichloroanisole, 1984-58-3 (pdf)
- Robust summaries: Dicamba (3,6-dichloro-2-methoxybenzoic acid), 1918-00-9 (pdf)
- Eight IUCLID (version 4) export files, one for each chemical

Copies:

Dr. Ralph Parod, BASF Corp. Dr. David Cortes, BASF Corp.